

Baltimore County
Zoning Commissioner
Office of Planning & Zoning
Towson, Maryland 21204
494-3353

J. Robert Haines
Zoning Commissioner

NOTICE OF HEARING

The Zoning Commissioner of Baltimore County, by authority of the Zoning Act and Regulations of Baltimore County will hold a public hearing on the property identified herein in Room 106 of the County Office Building, located at 111 W. Chesapeake Avenue in Towson, Maryland as follows:

Case number: 88-344-A
Petition for Zoning Variance
1111 York Road and Bosley Avenue
(816 York Road)
9th Election District - 4th Councilmanic District
Petitioners: Mt. Olive Baptist Church of Sandy Bottom
DATE/TIME: TUESDAY, MARCH 8, 1989 at 2:00 p.m.

Variance to permit a front yard of zero (0) feet in lieu of the required average of 40.50 feet and to permit sideyard of zero (0) feet in lieu of the required average of thirty (30) feet.

permit may be issued within
inner will, however, entertain
during this period for good
ved in this office by the date

BALTIMORE COUNTY, MARYLAND No. 45679
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

DATE: 11/20/87 ACCOUNT: 01-615-000
AMOUNT: \$ 100.00
RECEIVED: 11/20/87
FOR: 1111 York Road
B012*****1000818 #23-F

Baltimore County
Zoning Commissioner
Office of Planning & Zoning
Towson, Maryland 21204
494-3353

J. Robert Haines
Zoning Commissioner

DATE: MAR 02 1989

The Reverend Avery Penn
Mount Olive Baptist Church of Sandy Bottom
816 York Road
Towson, Maryland 21204

Re: Case number: 88-344-A
Petition for Zoning Variance
1111 York Road and Bosley Avenue
(816 York Road)
9th Election District - 4th Councilmanic District
Petitioners: Mt. Olive Baptist Church of Sandy Bottom

Dear Rev. Penn:

Please be advised that \$76.41 is due for advertising and posting of the above-referenced property. All advertising and posting fees must be paid prior to the hearing. Do not remove the sign(s) from the property from the time it posted by this office until the day of the hearing itself.

THIS FEE MUST BE PAID AND THE ZONING SIGN AND POST RETURNED
ON THE DAY OF THE HEARING OR THE ORDER SHALL NOT BE ISSUED.

Please make your check payable to Baltimore County, Maryland and forward to the Zoning Office, County Office Building, Room 113, Towson, Maryland 21204.

BALTIMORE COUNTY, MARYLAND No. 50292
OFFICE OF FINANCE - REVENUE DIVISION
MISCELLANEOUS CASH RECEIPT

DATE: 3/8/88 ACCOUNT: R-01-615-000
AMOUNT: \$ 76.41
RECEIVED: 3/8/88
FOR: 1111 York Road
B012*****76418 88-344-A

PETITIONER'S EXHIBIT 3

AS WITNESS the corporate seal of the said THE TRUSTEES OF MOUNT OLIVE BAPTIST CHURCH OF SANDY BOTTOM, BALTIMORE COUNTY, MARYLAND, and the signature of the undersigned, the President thereof, the day and year above written.

THE TRUSTEES OF MOUNT OLIVE BAPTIST CHURCH OF SANDY BOTTOM, BALTIMORE COUNTY, MARYLAND, a body corporate.

WILLIAM H. PIERCE, President

STATE OF MARYLAND, BALTIMORE COUNTY, to wit:

I, J. Robert Haines, Zoning Commissioner of Baltimore County, do hereby certify that on this 8th day of March, 1989, in the year 1989, I have received and filed for record, before me, the undersigned, a body corporate of the said THE TRUSTEES OF MOUNT OLIVE BAPTIST CHURCH OF SANDY BOTTOM, BALTIMORE COUNTY, MARYLAND, and that they acknowledged the foregoing deed to be the act of said body corporate.

IN WITNESS whereof my hand and official seal.

J. Robert Haines
Zoning Commissioner

APPROVED AND ACCEPTED this 8th day of March, 1989.

WILLIAM H. PIERCE, President

STATE OF MARYLAND, BALTIMORE COUNTY, to wit:

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J. Robert Haines
Zoning Commissioner

3118 407

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J. Robert Haines
Zoning Commissioner

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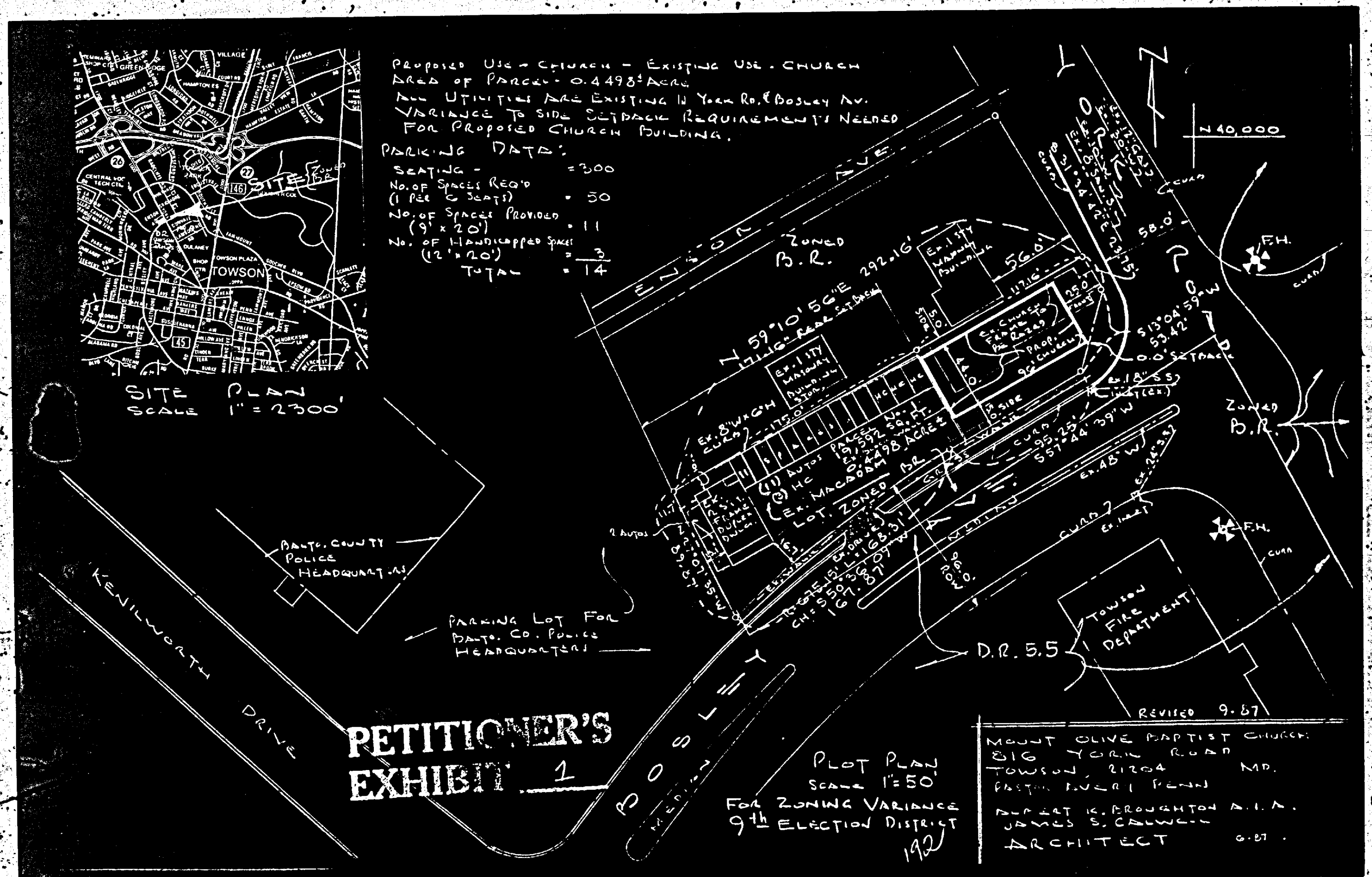
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J. Robert Haines
Zoning Commissioner



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J. Robert Haines
Zoning Commissioner

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IN WITNESS whereof my hand and official seal.

J. Robert Haines
Zoning Commissioner

BIOGRAPHICAL OUTLINE

Albert E. Broughton, A.I.A., M.P.A.
1017 Chestnut Ridge Drive
Lutherville, Maryland 21093

Born: Baltimore City, Maryland - August 8, 1928

Education:

High School - Baltimore Polytechnic Institute - Graduated 1947
General Technical Course (B-Course)

Maryland Institute - Architectural and Engineering Drafting -
Graduated 1949

Johns Hopkins University - Certificate Degree/Architecture - 1959

University of Baltimore - Bachelor of Arts Degree - Pre-Law -
1975

University of Baltimore - Graduate School, Masters Degree in Public
Administration - Graduated 1981

University of Baltimore - Graduate School, Masters Degree - Legal
Studies - Graduated 1985

Continuing Education Courses:

Catonsville Community College - Credited Courses in Building and Fire
Codes; Maryland Construction Law,
completed 10 week course (2.5 CEU's)
sponsored through Baltimore/
Washington Chapters of A.I.A. and
C.S.I.

Professional Licenses:

Licensed to practice architecture in Maryland since June, 1960,
licensed to practice architecture in Pennsylvania since 1963.

I have 23 years of diversified general practice of architecture,
designing building types such as: medical centers, office buildings,
apartments, schools, libraries, churches, banks and residences.

Positions Held:

Eastern Regional Architect for Montgomery Ward Company, responsible
for the design and construction of retail facilities in 17 Eastern
seaboard states (5 years). Head of Plans Review and Approval for the
Maryland State Department of Health and Mental Hygiene; responsible
for review and approval of all licensable medical facilities through-
out the state. (16 years)

Professional Affiliations:

Corporate Member - Baltimore Chapter - American Institute of Architects

**PETITIONER'S
EXHIBIT 5**

PETITIONER'S EXHIBIT 5

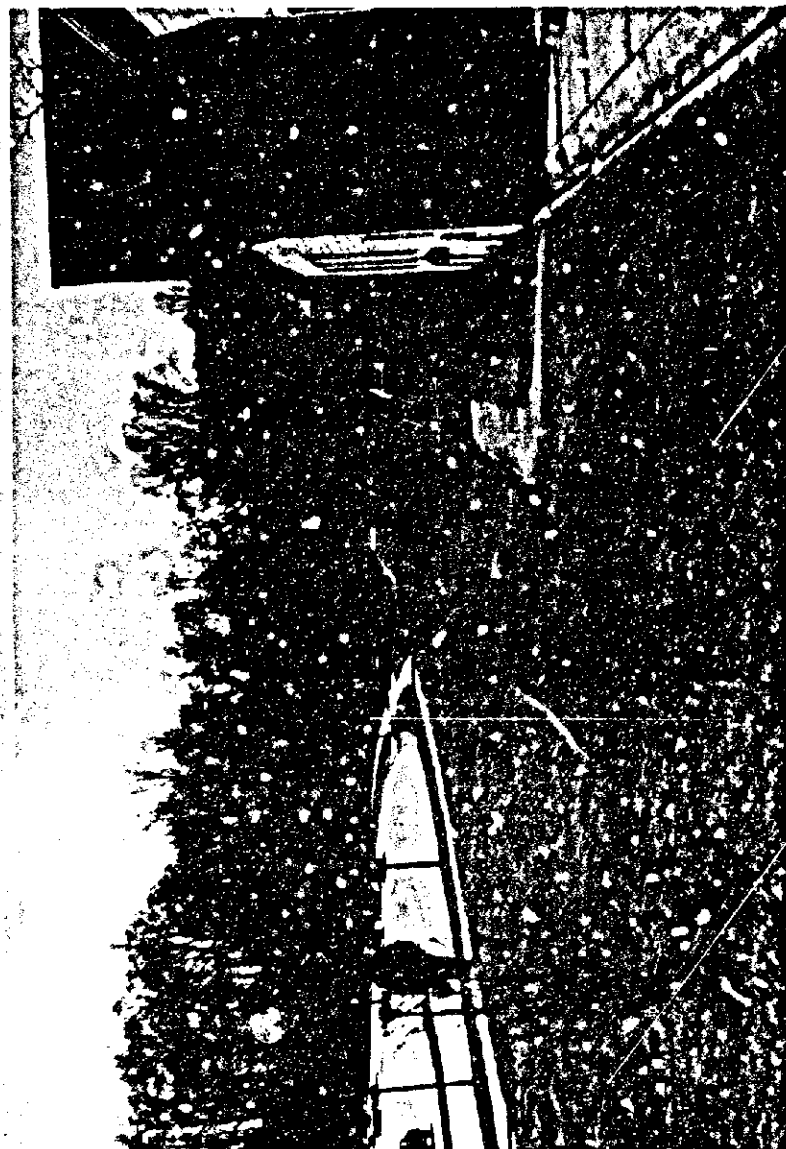
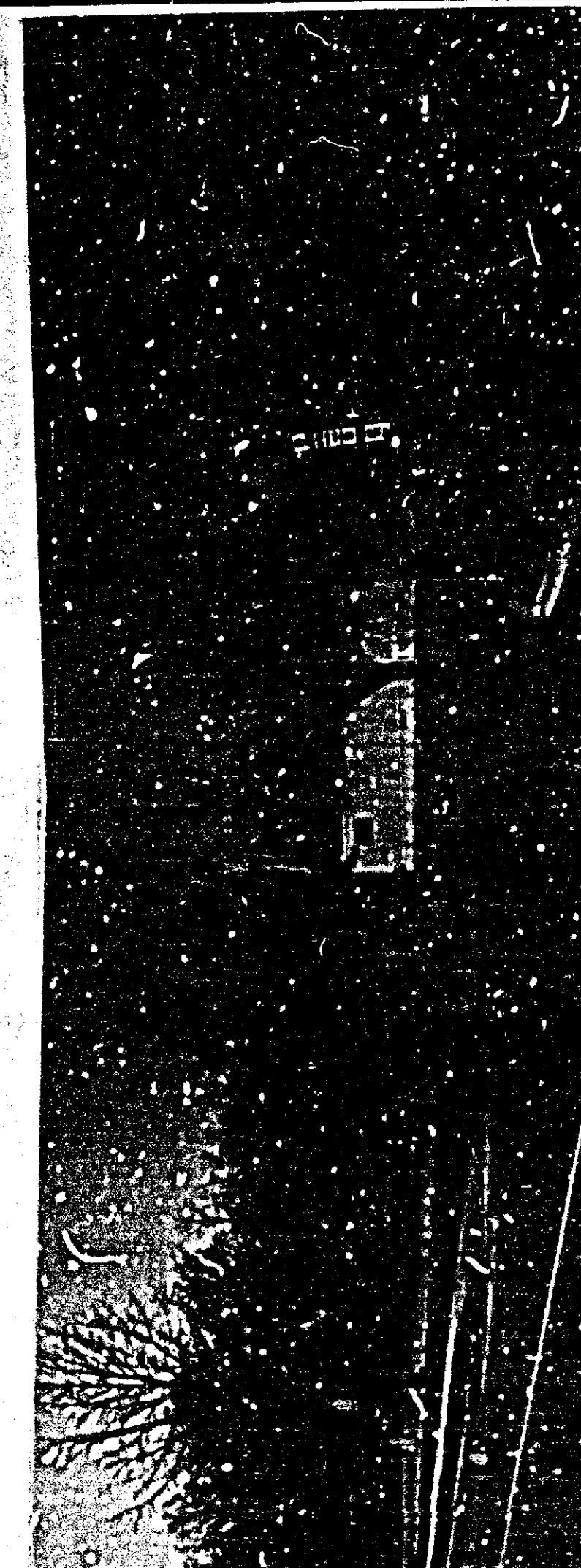


No. 6
Taken from western sidewalk
of York Road looking west
down the northern face of
the subject property.



No. 7
Close up of parking lot on
subject property taken from
southeast corner thereof.

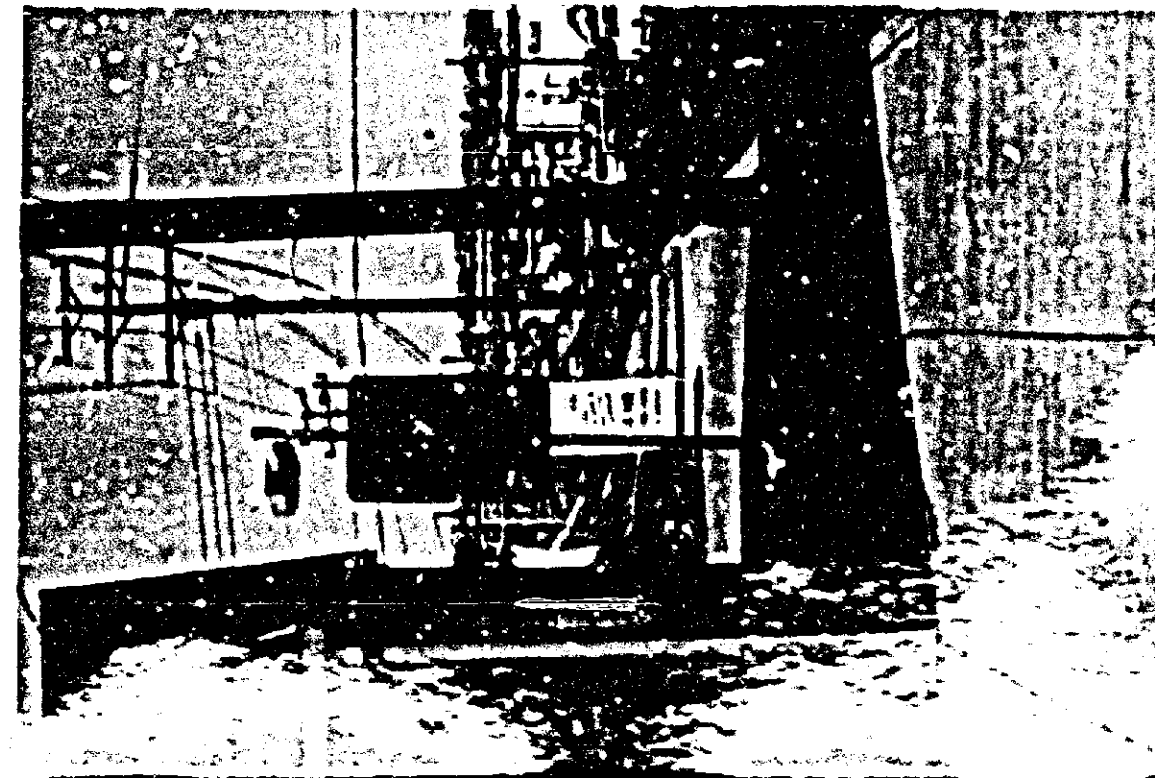
No. 8
Composite of three photo-
graphs of Baltimore County
Police parking lot located
adjacent to subject property,
taken from median strip of
Bosley Avenue.



No. 3
Taken from northwest corner
of intersection of York
Road and Bosley Avenue
looking west past subject
property and down Bosley
Avenue.



No. 2
Taken from northern sidewalk
of Bosley Avenue looking
east toward subject property.



No. 4
Taken from northwest corner
of intersection of York
Road and Bosley Avenue
looking north down York Road.



No. 5
Taken from northeast corner
of the intersection of York
Road and Bosley Avenue
looking south down York Road.

Case Number 88-344-A
Photographs of Mount Olive
Baptist Church
21204
Taken February 6, 1988
by James W. Brooks, Jr.

PETITIONER'S
EXHIBIT 2

BALTIMORE COUNTY DEPARTMENT OF ENVIRONMENTAL
PROTECTION AND RESOURCE MANAGEMENT

Zoning Commissioner
Office of Planning and Zoning
County Office Building
Towson, Maryland 21204

Zoning Item # 192, Zoning Advisory Committee Meeting of December 4, 1987
Property Owner: Mount Olive Baptist Church of Sandy Bottom
Location: NW/4 York Rd. and Bosley Ave. District
Water Supply: meter Sewage Disposal: meter

COMMENTS ARE AS FOLLOWS:

- () Prior to approval of a Building Permit for construction, renovation and/or installation of equipment for any existing or proposed food service facility, complete plans and specifications must be submitted to the Plans Review Section, Bureau of Regional Community Services, for final review and approval. (If Church intends to have a commercial kitchen).
- () Prior to new installation of fuel burning equipment, the owner shall contact the Bureau of Air Quality Management, 496-3775, to obtain requirements for such installation before work begins.
- () A permit to construct from the Bureau of Air Quality Management is required for such items as spray paint processes, underground gasoline storage tanks (5,000 gallons or more) and any other equipment or process which exhausts into the atmosphere.
- () A permit to construct from the Bureau of Air Quality Management is required for any charbroiler operation which has a total cooking surface area of five (5) square feet or more.
- () Prior to approval of a Building Permit Application for renovations to existing or construction of new health care facilities, complete plans and specifications of the building, food service area and type of equipment to be used for the food service operation must be submitted to the Plans Review and Approval Section, Division of Engineering and Maintenance, State Department of Health and Mental Hygiene for review and approval.
- () Prior to any new construction or substantial alteration of public swimming pool, wading pool, bathhouse, saunas, whirlpools, hot tubs, water and sewerage facilities or other appurtenances pertaining to health and safety, two (2) copies of plans and specifications must be submitted to the Baltimore County Department of Environmental Protection and Resource Management for review and approval. For more complete information, contact the Recreational Hygiene Section, Bureau of Regional Community Services, 496-3811.
- () Prior to approval for a nursery school, owner or applicant must comply with all Baltimore County regulations. For more complete information, contact the Division of Maternal and Child Health.
- () If lubrication work and oil changes are performed at this location, the method providing for the collection of waste oil must be in accordance with the State Department of the Environment.
- () Prior to razing of existing structure/s, petitioner must contact the Division of Waste Management at 494-3768, regarding removal and/or disposal of potentially hazardous materials and solid wastes. Petitioner must contact the Bureau of Air Quality Management regarding removal of asbestos, 494-3775.
- () Any abandoned underground storage tanks containing gasoline, waste oil, solvents, etc., must have the contents removed by a licensed hauler and tank removed from the property or properly backfilled. Prior to removal or abandonment, owner must contact the Division of Waste Management at 494-3768.
- () Soil percolation tests, have been _____, must be _____ conducted.
 - () The results are valid until _____.
 - () Soil percolation test results have expired. Petitioner should contact the Division of Water and Sewer to determine whether additional tests are required.
- () Where water wells are to be used as a source of water supply, a well meeting the minimum Baltimore County Standards must be drilled.
- () In accordance with Section 13-117 of the Baltimore County Code, the water well yield test
 - () shall be valid until _____.
 - () is not acceptable and must be repeated. This must be accomplished prior to conveyance of property and approval of Building Permit Application.
- () Prior to occupancy approval, the potability of the water supply must be verified by collection of bacteriological and chemical water samples.
- () If submission of plans to the County Review Group is required, a Hydrogeological Study and an Environmental Effects Report must be submitted.
- () Others _____

Kevin D. Morrey
BUREAU OF WATER QUALITY AND RESOURCE
MANAGEMENT

Taken from median strip
of Bosley Avenue looking
northeast toward subject
property.

No. 1

Baltimore County
Department of Public Works
Bureau of Traffic Engineering
County Office Building
Towson, Maryland 21204
494-3354

Mr. J. Robert Haines
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Dear Mr. Haines:

The Bureau of Traffic Engineering has no comments for items number 184, 185, 186, 187, 188, 189, 190, 191, 192, and 193.

Very truly yours,

Michael S. Flanigan
Traffic Engineer Associate II

MSF:sb

RECEIVED
JAN 20 1988
ZONING OFFICE

Baltimore County
Fire Department
Towson, Maryland 21204-2286
494-4500

Paul H. Reiche
Chief

J. Robert Haines
Zoning Commissioner
Office of Planning and Zoning
Baltimore County Office Building
Towson, MD 21204

Re: Property Owner: Mt. Olive Baptist Church of Sandy Bottom

Location: NW/4 York Rd., and Bosley Avenue

Item No. 192

Zoning Agenda: Meeting of 12/1/87

Gentlemen:

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below marked with an "X" are applicable and required to be corrected or incorporated into the final plans for the property.

- () 1. Fire hydrants for the referenced property are required and shall be located at intervals of _____ feet along an approved road in accordance with Baltimore County Standards as published by the Department of Public Works.
- () 2. A second means of vehicle access is required for the site.
- () 3. The vehicle dead end condition shown at _____ EXCEEDS the maximum allowed by the Fire Department.
- () 4. The site shall be made to comply with all applicable parts of the Fire Prevention Code prior to occupancy or beginning of operation.
- (X) 5. The buildings and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code," 1976 edition prior to occupancy.
- () 6. Site plans are approved, as drawn.
- () 7. The Fire Prevention Bureau has no comments at this time.

REVIEWER: Carl J. Kelly, 12-1-87 Noted and Approved: John E. O'Hall
Planning Group Fire Prevention Bureau
Special Inspection Division

/s/



Maryland Department of Transportation
State Highway Administration

Richard H. Trainor
Secretary
HARRY M.
ADMINISTRATOR

DEC 10 1987

ZONING OFFICE

December 4, 1987

Mr. J. Robert Haines
Zoning Commissioner
County Office Building
Towson, Maryland 21204

Re: ZAC Meeting of 12-1-87

ITEM: #192.

Property Owner: Mount Olive Baptist Church of Sandy Bottom
Location: NW/4 York Road, Route 45 and Bosley Avenue
Existing Zoning: B.R.
Proposed Zoning: Variance to permit a front yard of zero (0) feet in lieu of the required average of 40.50 feet and to permit side yards of zero (0) feet in lieu of the required average of thirty feet
Area: 0.4498 acres
District: 9th Election District

Dear Mr. Haines:

On review of the submittal of Item #192, the State Highway Administration - Bureau of Engineering Access Permits finds the plan generally acceptable with no access to York Road (Maryland Route 45).

If you have any questions, please contact Larry Brocato of this office.

Very truly yours,

Gregory J. Mills, Jr.
Acting Chief
Bureau of Engineering
Access Permits

LR:maw

cc: Mr. J. Ogle

My telephone number is (301) 333-1350

Typewriter for Impaired Hearing or Speech
383-7555 Baltimore Metro - 843-0831 D.C. Metro - 1-800-422-5042 Nationwide Toll Free
707 North Calvert St., Baltimore, Maryland 21203-0717

BALTIMORE COUNTY ZONING PLANS ADVISORY COMMITTEE

February 25, 1988

COUNTY OFFICE BLDG.
111 W. Chesapeake Ave.
Towson, Maryland 21204

James W. Brooks, Jr., Esquire
Piper & Harbury
36 S. Charles Street
Baltimore, Maryland 21201

RE: Item No. 192 - Case No. 88-344-A
Petitioner: Mount Olive Baptist Church
of Sandy Bottom
Petition for Zoning Variance

Dear Mr. Brooks:

The Zoning Plans Advisory Committee has reviewed the plans submitted with the above-referenced petition. The following comments are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties are made aware of plans or problems with regard to the development plans that may have a bearing on this case. The Director of Planning may file a written report with the Zoning Commissioner with recommendations as to the suitability of the requested zoning.

Enclosed are all comments submitted from the members of the Committee at this time that offer or request information on your petition. If similar comments from the remaining members are received, I will forward them to you. Otherwise, any comment that is not informative will be placed in the hearing file. This petition was accepted for filing on the date of the enclosed filing certificate and a hearing scheduled accordingly.

Very truly yours,

James E. Dyer, Jr.
JAMES E. DYER
Chairman
Zoning Plans Advisory Committee

JED:kbb

Enclosures

PIPER & MARBURY

1100 CHARLES CENTER SOUTH
38 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201
SO: 838-8330
TELEPHONE 201-838-0088
CABLE PIPERMAR BAL
TELEX 808084

1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036
202-681-3900

576-1758

February 29, 1988

Mr. J. Robert Haines
Baltimore County Zoning Commissioner
Office of Planning and Zoning
Towson, Maryland 21204

Dear Commissioner Haines:

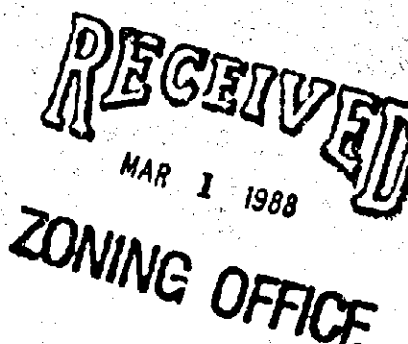
Enclosed in connection with the Petition for Zoning Variance filed by Mount Olive Baptist Church of Sandy Bottom (Case No. 88-344-A) is a Memorandum in Support of Petition for Zoning Variance setting forth the basic facts and arguments of the case. Our presentation at the public hearing scheduled for Tuesday, March 8, 1988 at 2:00 p.m. will be based upon this format.

Sincerely,

James W. Brooks, Jr.
James W. Brooks, Jr.

JWB/htw
Enclosure
cc w/Enc.

Reverend Avery Penn
Albert K. Broughton
Phyllis Cole Friedman, Esq.
Peter Max Zimmerman, Esq.



IN RE: PETITION FOR ZONING VARIANCE
NW/C York Road and 5th lg.
Avenue (816 York Road)
9th Election District
4th Councilmanic District
Mount Olive Baptist Church
of Sandy Bottom.
Petitioner

BEFORE THE ZONING
COMMISSIONER OF
BALTIMORE COUNTY
Case No. 88-344-A

MEMORANDUM IN SUPPORT OF PETITION FOR ZONING VARIANCE

The Mount Olive Baptist Church of Sandy Bottom (the "Church"), through its legal counsel James W. Brooks, Jr., respectfully submits this Memorandum in Support of Petition for Zoning Variance. As the testimony and evidence which the Church will present at the public hearing for this case, scheduled for Tuesday, March 8, 1988 at 2:00 p.m. will show, the Church, pursuant to Section 307 of the Baltimore County Zoning Regulations, 1987 Edition (the "BCZR"), is in good faith requesting a variance from the front yard and side yard requirements of the B.R. (Business, Roadside) Zone, set forth in Sections 238.1 and 238.2 of the BCZR.

Strict compliance with such regulations will render the Church unable to build a new house of worship on its property and result in practical difficulty and unreasonable hardship to the Church. The variance requested and the proposed church building are in harmony with the spirit and intent of the B.R. Zone area regulations. The design and location of the proposed building take into account the

-1-

5483j:2/29/88
14947-1

constraints presented by the Church property and its immediate surroundings. Approval of the variance will not result in an injury to the public health, safety or general welfare.

I. Description of Existing Property

The Church is located at 816 York Road, Towson, Maryland, on the northwest corner of the intersection of York Road and Bosley Avenue (the "Property"). The Property is irregularly shaped with an eastern boundary of approximately 24 feet along York Road, a curving southern boundary adjacent to Bosley Avenue of approximately 260 feet, a western boundary of approximately 90 feet which begins on Bosley Avenue and extends northwesterly, parallel to York Road, and a northern boundary of approximately 292 feet. The Plat and Surveyor's Description filed with the Petition for Zoning Variance provide detailed perimeter information.

The Property is bounded on the north by an automobile repair shop, on the east across York Road by a gasoline service station, on the south across Bosley Avenue by the Towson Fire Department, Company No. 1 and the Baltimore County Fire Department Headquarters and Training Academy (the "Fire Department"), and on the west by the Baltimore County Police Department Headquarters (the "Police Department").

The western end of the Property is improved with a two-story frame duplex dwelling which the Church leases to two families at below-market rents. The eastern end of the

-2-

5483j:2/29/88
14947-1

Property is improved with a one-story frame church building, originally constructed in 1906-07 with an addition added in the 1920's (the "Existing Building"). The Existing Building seats approximately 185 people and, although its interior has been remodeled, is reaching the point where both maintenance costs and a need for greater seating capacity dictate that the best course of action is to replace the structure.

The Property also includes a parking lot located between the duplex and the Existing Building with an entrance onto Bosley Avenue. This lot currently provides parking for approximately 20 cars. As evidenced by a letter dated September 1, 1987 from Cornelius J. Behan, Chief of Police, the original of which was filed by the Church with the Petition for Zoning Variance, the Church allows Police Department personnel to park on the Property during weekdays and in return members of the Church are permitted to use the Police Department parking lot on weekends. This sharing arrangement provides both participants with additional parking spaces in close proximity to the principal uses served.

II. Historical Background

The Church will be 100 years old in May, 1988. It was incorporated as a church in the State of Maryland on June 26, 1893. In that same year the Church acquired its initial interest, as a tenant, in a portion of what now constitutes the Property. Three years later in 1896 the Church bought the

-3-

5483j:2/29/88
14947-1

leased land in fee simple and on this lot, which was rectangular in shape with a boundary of 36 feet along the York Turnpike Road and a depth of 100 feet, constructed the original portion of the Existing Building in 1906-07. In 1914 the Church purchased additional contiguous land and the combination of these properties produced a lot which was rectangular in shape with a boundary of 100 feet along the York Road Turnpike and a depth of 300 feet, comprising approximately seven-tenths of an acre.

On March 8, 1957 in connection with the extension of Bosley Avenue and the widening of York Road, the Church conveyed approximately three-tenths of an acre of its land to Baltimore County, Maryland, leaving the Property in its present configuration, containing approximately forty-five hundredths of an acre. At this time the duplex now located on the western end of the Property was moved to that location from its original site adjacent to York Road.

III. Church Use, Growth and the Proposed Building

Regularly scheduled events at the Church include prayer meetings and bible study on Wednesday evenings (7:30-9:00 p.m.) and Sunday services consisting of church school (9:20 a.m.) and worship services (10:50 a.m.). Approximately fifteen times a year the Church holds Sunday evening worship services. The Church is also used by the congregation for wedding and funeral services.

-4-

5483j:2/29/88
14947-1

The size of the Church congregation increased significantly in recent years. Sunday worship services frequently draw more than 185 persons, exceeding the seating capacity of the Existing Building. The educational space at the rear of the Existing Building used for church school is inadequate in size, layout and utilities. These factors, combined with continued maintenance costs of the Existing Building and its inability to accommodate further expansion, have led to the Church's decision to raze the Existing Building and construct a new facility on the same site (the "Proposed Building").

The Proposed Building will be rectangular in shape with a length of 96 feet and a width of 44 feet. The lower level will contain educational space for the church school and the main level and balcony will provide seating for 300 persons. The Proposed Building will be set back 25 feet from York Road, in contrast to the Existing Building which fronts directly upon York Road. This front setback, together with a side setback of 15 feet along Bosley Avenue, means that the majority of the Proposed Building will be located over the former footprint of the Existing Building and will preserve the line-of-sight to the intersection of York Road and Bosley Avenue necessary for vehicles traveling north on Bosley Avenue. The setback for the northern edge of the Proposed Building will be no less than that presently provided by the Existing Building and rear yard area requirements of the B.R. will be satisfied by the Proposed Building.

-5-

5483j:2/29/88
14947-1

IV. Traffic and Parking

The location of the Proposed Building preserves the existing parking lot on the Property. An alternative location, placing the Proposed Building on the existing parking area and moving the parking closer to York Road is not acceptable because (i) while front yard requirements might be satisfied, a variance for side yard requirements would still be required; and (ii) movement of the parking lot entrance closer to the intersection of York Road and Bosley Avenue is not desirable.

Traffic and parking issues are adequately addressed for the following reasons: (a) Church activities, concentrated on Wednesday evenings and Sunday mornings, occur at off-peak hours for traffic flow; (b) the Proposed Building's seating capacity of 300 persons requires 50 parking spaces (1 for each 6 seats) pursuant to Section 409.2(b)(1) of the BCZR and of that total 14 spaces will be provided on the Property and more than 36 spaces are available on the Police Department parking lot; and (c) approximately one-third of the Church congregation is over sixty-five years of age and either attend services with others or are dropped off and picked up, rather than driving themselves.

V. Conclusion

The Church has a long history at the Property and it is important to the congregation to remain at this location. The Existing Building was constructed many years before the

-6-

5483j:2/29/88
14947-1

enactment of zoning regulations in Baltimore County, Maryland in 1945. The extension of Bosley Avenue and the widening of York Road in 1957 took away a major portion of the Church's land, leaving the remainder unsuitable for the construction of almost any structure under strict compliance with the BCZR. The present Police Department, Fire Department and business uses all arose around the Church over the years, displacing the residential community which the Church originally served.

The Church, however, continues to grow and the Petition for Zoning Variance and the Proposed Building it contemplates, meet the Church's requirements while giving serious consideration to the limitations imposed by the Property and its surroundings. Replacement of the Existing Building with the Proposed Building and continued use of the Property as a place of worship will enhance the community. The Petition for Zoning Variance is in harmony with the spirit and intent of the BCZR. Denial will result in practical difficulty and unreasonable hardship on the Church and approval will not result in an injury to the public health, safety or general welfare.

-7-

5483j:2/29/88
14947-1

For all of these reasons, the Church respectfully requests approval of the Petition for Zoning Variance.

Respectfully submitted

James W. Brooks, Jr.
James W. Brooks, Jr.
Piper & Marbury
1100 Charles Center South
36 South Charles Street
Baltimore, Maryland 21201
(301) 576-1758

Attorney for Petitioner

I HEREBY CERTIFY that on this 22nd day of February, 1988, a copy of the foregoing Memorandum in Support of Petition for Zoning Variance was mailed to Phyllis Cole Friedman, People's Counsel for Baltimore County, Maryland, and Peter Max Zimmerman, Deputy People's Counsel for Baltimore County, Maryland, Room 223, Court House, Towson, Maryland 21204.

James W. Brooks, Jr.
James W. Brooks, Jr.

54831:2/29/88
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Baltimore County, Maryland
PEOPLE'S COUNSEL
RM. 223, COURT HOUSE
TOWSON, MARYLAND 21204
404-2148

PHYLLIS COLE FRIEDMAN
People's Counsel

PETER MAX ZIMMERMAN
Deputy People's Counsel

March 3, 1988

J. Robert Haines, Esquire
Baltimore County Zoning Commissioner
County Office Building
111 W. Chesapeake Avenue
Towson, Maryland 21204

RE: Mount Olive Baptist Church of
Sandy Bottom, Petitioner -
Zoning Case No. 88-364-A

Dear Commissioner Haines:

We are in receipt of the Memorandum of the Petitioner in support of the new Mount Olive Baptist Church building.

At this time, our office believes that the proposal is in the public interest and deserving of a variance.

Sincerely yours,

Peter Max Zimmerman
Peter Max Zimmerman
Deputy People's Counsel

cc: James W. Brooks, Jr., Esquire

PHZ:ah

RECEIVED
MAR 4 1988
ZONING OFFICE

BALTIMORE COUNTY, MARYLAND
INTER-OFFICE CORRESPONDENCE

Mr. J. Robert Haines
TO: Zoning Commissioner

Date: February 22, 1988

FROM: P. David Fields
Director of Planning and Zoning
Zoning Petition Nos. 88-367-A, 88-369-A,
88-370-A, 88-364-A, 88-345-A,
SUBJECT: 88-369-A, 88-351-SPHX, 88-353-K, 88-371-A

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ZONING OFFICE

There are no comprehensive planning factors requiring comment on this petition.

P. David Fields
P. David Fields
Director

PDF:ma

cc: Ms. Shirley M. Hess, Legal Assistant, People's Counsel
File

CPS-008

PIPER & MARBURY
1100 CHARLES CENTER SOUTH
36 SOUTH CHARLES STREET
BALTIMORE, MARYLAND 21201

301-536-2530
TELECOPIER 301-536-0488
CABLE "PIPERMAR BAL"
TELEX 808084

WRITER'S DIRECT NUMBER
(301) 576-1758

1800 NINETEENTH STREET N.W.
WASHINGTON, D.C. 20036
202 861-3900

November 18, 1987

HAND DELIVER

Mr. W. Carl Richards
Zoning Coordinator
Baltimore County Office
of Planning and Zoning
111 West Chesapeake Avenue
Room 113
Towson, Maryland 21204

Dear Mr. Richards:

On August 12, 1987, Reverend Penn of the Mount Olive Baptist Church and I met with you for a pre-petition conference concerning a proposed zoning variance for the church property located at 816 York Road, Towson, Maryland. Enclosed are three copies of a fully executed Petition for Zoning Variance, ten copies of a Plot Plan and three copies of a Surveyor's Description for the property. The Petition and Plot Plan are revised in accordance with your comments from the pre-petition conference.

Also enclosed is a copy of a letter to Reverend Penn from Cornelius J. Behan, Chief of the Baltimore County Police, dated September 1, 1987, addressing the parking area which the police will make available to the Church for Sunday services.

I hope these revised and additional materials are sufficient for scheduling a hearing date. Please contact me if you have any questions.

Sincerely,
James W. Brooks, Jr.
James W. Brooks, Jr.

Enclosures

cc w/o Enc. Reverend Avery Penn
Albert K. Broughton, A.I.A.



BALTIMORE COUNTY POLICE DEPARTMENT

HEADQUARTERS

400 KENILWORTH DRIVE
TOWSON, MARYLAND 21204-4007
(301) 494-2214

Cornelius J. Behan
CHIEF OF POLICE

September 1, 1987

Reverend Avery Penn
Mt. Olive Baptist Church
York Road & Bosley Avenue
Towson, Maryland 21204

Dear Reverend Penn:

I am writing to you pursuant to your request to reflect what my understanding is concerning the informal policy as related to parking at both your church facility and the Baltimore County Police Department Headquarters parking lot.

It is my understanding that members of this department may park in your church lot on Monday thru Friday unless notified otherwise. In accordance with that, we have authorized you to allow members of your congregation to park on the southeast corner of the headquarters parking lot on Saturday and Sunday. Additionally, it should be pointed out that we are not assuming any responsibility for damage and/or theft which may occur to these vehicles while parked at the aforementioned location.

Should you have any questions concerning this correspondence, or have a different understanding of the agreement that presently exists, you may contact Lieutenant Ronald Schwartz, Commanding Officer, Property Management Division, at 494-2278. I would like to thank you for your cooperation and consideration with respect to allowing our members to utilize your parking lot during normal business hours.

Sincerely,
Cornelius J. Behan
Cornelius J. Behan
Chief of Police

CJB/afh

A BALTIMORE COUNTY POLICE DEPARTMENT DOCUMENT

DEED TO COUNTY COMMISSIONERS OF BALTIMORE COUNTY									
NO	INITIALS	LIBER	FOLIO	DATE	FROM	TO	DATE	INITIALS	LIBER
1	GLB	2564	577	1955	TEMPERANCE G. MORAN	1955	1955	GLB	2564
2	GLB	2564	577	1955	N. COOD & M. COOD	1955	1955	GLB	2564

OFFICE JOB NO. 738

